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January 23, 2017

**VIA ECF**

Honorable Magistrate Judge James Orenstein  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Keystone Global LLC, v. eBay, Inc., et al., 1:16-cv-06676 (PKC) (JO)**

Dear Magistrate Judge Orenstein:

I represent Defendant, HiPacking Inc. (“HiPacking”), as Local Counsel in the above-referenced action. I respectfully submit this letter on behalf of HiPacking, in accordance with Rule II.A.1. of Your Honor’s Individual Practice Rules, to request a two-week extension of time to answer, move or otherwise plead in response to Plaintiff Keystone Global LLC’s (“Plaintiff’s”) Complaint dated December 2, 2016.

Pursuant to Rule II.A.1., I respectfully request the extension, as follows:

- (1) HiPacking’s response to the Complaint is currently due on January 25, 2017.
- (2) This is HiPacking’s third request for adjournment or extension of the time for its response.
- (3) HiPacking’s first and second requests for two-week extensions were granted on December 28, 2016 and January 10, 2017, respectively.
- (4) Non-local Counsel for HiPacking and Counsel for Plaintiff have conferred and Plaintiff consents to the requested two-week extension.
- (5) This extension does not affect any other previously scheduled dates set by the Court.

HiPacking requests this extension in good faith. Non-local Counsel for HiPacking and Counsel for Plaintiff are continuing to discuss a possible resolution and seek an additional extension to continue working toward an agreement and final settlement as to HiPacking.

Accordingly, HiPacking respectfully requests that the Court enter an Order extending the time in which HiPacking must serve its answer, motion, or otherwise plead in response to the Complaint through and including February 8, 2017.

Thank you for your attention and consideration of this matter.

Respectfully submitted,

THE RANDO LAW FIRM P.C.

By: /s/Robert J. Rando  
Robert J. Rando (RR-5765)

RJR:lr

cc: Counsel of Record (via ECF)